

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAVID CHOI, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

COUPANG, INC., BOM SUK KIM, GAURAV
ANAND, MICHAEL PARKER, MATTHEW
CHRISTENSEN, LYDIA JETT, NEIL
MEHTA, BENJAMIN SUN, KEVIN WARSH,
HARRY YOU, GOLDMAN SACHS & CO.
LLC, ALLEN & COMPANY LLC, and J.P.
MORGAN SECURITIES LLC,

Defendants.

Case No. 1:22-cv-07309-VSB

NOTICE OF MOTION OF THE NEW
YORK CITY PUBLIC PENSION FUNDS
FOR CONSOLIDATION, APPOINTMENT
AS LEAD PLAINTIFF AND APPROVAL
OF LEAD COUNSEL

NAYA 1740 FUND LTD., NAYA
COLDWATER FUND, NAYA MASTER
FUND LP, NAYAWOOD LP, and
QUANTUM PARTNERS LP, Individually and
on Behalf of All Others Similarly Situated,

Plaintiff,

v.

COUPANG, INC., BOM SUK KIM, GAURAV
ANAND, MICHAEL PARKER, MATTHEW
CHRISTENSEN, LYDIA JETT, NEIL
MEHTA, BENJAMIN SUN, KEVIN WARSH,
HARRY YOU, GOLDMAN SACHS & CO.
LLC, ALLEN & COMPANY LLC, J.P.
MORGAN SECURITIES LLC, CITIGROUP
GLOBAL MARKETS INC., HSBC
SECURITIES (USA), INC., DEUTSCHE
BANK SECURITIES INC., UBS SECURITIES
LLC, MIZUHO SECURITIES USA LLC, and
CLSA LIMITED,

Defendants.

Case No. 1:22-cv-08756-VSB

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that the New York City Public Pension Funds (the “NYC Funds”)¹, by and through their counsel, will and do hereby move this Court, pursuant to Federal Rule of Civil Procedure 42, Section 27(a)(3) of the Securities Act of 1933, 15 U.S.C. § 77z-1(a)(3), and Section 21D(a)(3) of the Securities Exchange Act of 1934 (the “Exchange Act”), 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995, for an Order: (1) consolidating the above-captioned actions; (2) appointing the NYC Funds as Lead Plaintiff on behalf of a class (the “Class”) consisting of all persons and entities other than the above-captioned Defendants that purchased or otherwise acquired: (a) Coupang, Inc. (“Coupang”) Class A common stock pursuant and/or traceable to the registration statement issued in connection with Coupang’s March 2021 initial public offering, and/or (b) Coupang securities between March 11, 2021 and July 12, 2022, inclusive; and (3) approving proposed Lead Plaintiff’s selection of Pomerantz LLP as Lead Counsel for the Class.

In support of this Motion, the NYC Funds submit: (i) a Memorandum of Law; (ii) the Declaration of Jeremy A. Lieberman and its accompanying exhibits; and (iii) a Proposed Order.

Dated: October 25, 2022

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

Jeremy A. Lieberman

Emma Gilmore

J. Alexander Hood II

600 Third Avenue, 20th Floor

New York, New York 10016

¹ For purposes of this motion, the “NYC Funds” are the Teachers’ Retirement System of the City of New York, the New York City Employees Retirement System, the New York City Police Pension Fund, the New York City Fire Department Pension Fund, the Board of Education Retirement System of the City of New York, the New York City Deferred Compensation Plan, and the Teachers’ Retirement System of the City of New York Variable Annuity Program.

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Funds and Proposed Lead Counsel for the Class*